

1 MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com
2 ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzalez@mofo.com
3 ERIC A. TATE (CA SBN 178719)
ETate@mofo.com
4 RUDY Y. KIM (CA SBN 199426)
RKim@mofo.com
5 MORRISON & FOERSTER LLP
425 Market Street
6 San Francisco, California 94105-2482
Telephone: 415.268.7000
7 Facsimile: 415.268.7522

8 KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsflp.com
9 HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsflp.com
10 BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
11 Washington DC 20005
Telephone: 202.237.2727
12 Facsimile: 202.237.6131

13 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS' AMENDED
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL EXHIBITS TO
THEIR MOTION TO COMPEL
RESPONSES TO
INTERROGATORIES AND
PRODUCTION OF DOCUMENTS**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Amended Administrative Motion to File Under Seal Exhibits to their Motion to Compel Responses to Interrogatories and Production of Documents (Dkt. 684).¹

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1A	Highlighted Portions	Plaintiff
Exhibit 3	Entire Document	Plaintiff
Exhibit 6	Entire Document	Plaintiff
Exhibit 15	Highlighted Portions	Defendants
Exhibit 18	Entire Document	Plaintiff
Exhibit 21	Highlighted Portions	Plaintiff

3. Exhibit 1A is Uber's First Set of Requests for Production, and Exhibit 3 is Waymo's Responses to these Requests for Production. I understand that the highlighted portions of Exhibit 1A contain technical information designated by Waymo as either confidential or highly confidential. Exhibit 3 was designated by Waymo as "Highly Confidential – Attorneys' Eyes Only" by Waymo under the Protective Order.

4. Exhibit 6 is Waymo's Responses to Uber's First set of Interrogatories, which was likewise designated "Highly Confidential – Attorneys' Eyes Only" by Waymo under the Protective Order.

¹ This Amended Declaration has been revised from the original (Dkt. 684-1) only with respect to Exhibit 15, in order to narrow Defendants' request for sealing.

